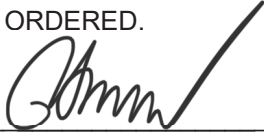


Application granted. The status conference scheduled for May 18, 2021 is adjourned to 2:30 p.m. on July 14, 2021. At the time of the conference, all parties shall call: (888) 398-2342; access code: 3456831.

The Government is directed to submit an Order, on consent, for this Court's approval that excludes time under the Speedy Trial Act from May 18, 2021 to July 14, 2021.

The Clerk of the Court is respectfully directed to terminate the motion sequence pending at Doc. 35.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
May 14, 2021

TANNER & ORTEGA, L.L.P.
ATTORNEYS AT LAW
TANNERORTEGA.COM
HOWARD E. TANNER*
HUGO G. ORTEGA
BARRISTERS OF N.Y., N.J. AND D.C. BAR

WHITE PLAINS OFFICE
175 MAIN STREET
SUITE 800
WHITE PLAINS, NY 10601
OFFICE: (914) 358-5998
FAX: (914) 761-0995

May 13, 2021

Re: *United States v. Kindle*, et al.
21 Cr. 153 (PMH)
Letter Motion for Adjournment of Status Conference

Dear Judge Halpern:

I am appointed to represent co-defendant Jonatan Trimino in the above matter which is scheduled for a status conference on May 18, 2021 at 2:30 pm. I write to the Court, joined by co-counsels Bruce Koffsky (for co-defendant Kindle), John Wallenstein (for co-defendant Mercado) and Stephen Lewis (for co-defendant Velez), and with consent of the Government, for a six-week adjournment of the status conference to a date and time convenient to the Court. We are in receipt of voluminous electronic discovery and I am informed by the Government that additional discovery will be disclosed shortly.

I make this application in order to allow counsel time to review the aforementioned discovery as well as to give the parties an opportunity to engage in meaningful plea negotiations.

All co-counsel further waive time under the Speedy Trial Act, pursuant to 18 U.S.C. §3161(h)(7)(A) until the new status conference date to be set by the Court.

Thank you, Your Honor, for your consideration of this matter.

Very truly yours,

Tanner & Ortega, L.L.P.



Howard E. Tanner

cc: All Parties (By ECF)